

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 24-cr-20668

Hon. MATTHEW F. LEITMAN

DOVID AKIVA SHENKMAN,

Defendant.

TARA HINDELANG
DOJ-USAO
211 W. Fort Street, Ste 2001
Detroit, MI 48226
313-410-5177
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SANFORD A. SCHULMAN
Attorney for Defendant:
DOVID AKIVA SHENKMAN
500 Griswold Street, Suite 2340
Detroit, Michigan 48226
(313) 963-4740
saschulman@comcast.net

EXHIBIT ONE IN SUPPORT OF
DEFENDANT, DOVID AKIVA SHENKMAN's
RENEWED MOTION TO SET ASIDE ORDER OF DETENTION
AND REQUEST FOR HEARING

DETAILED PROPOSED PLAN FOR BOND

Arnold Shenkman, Father

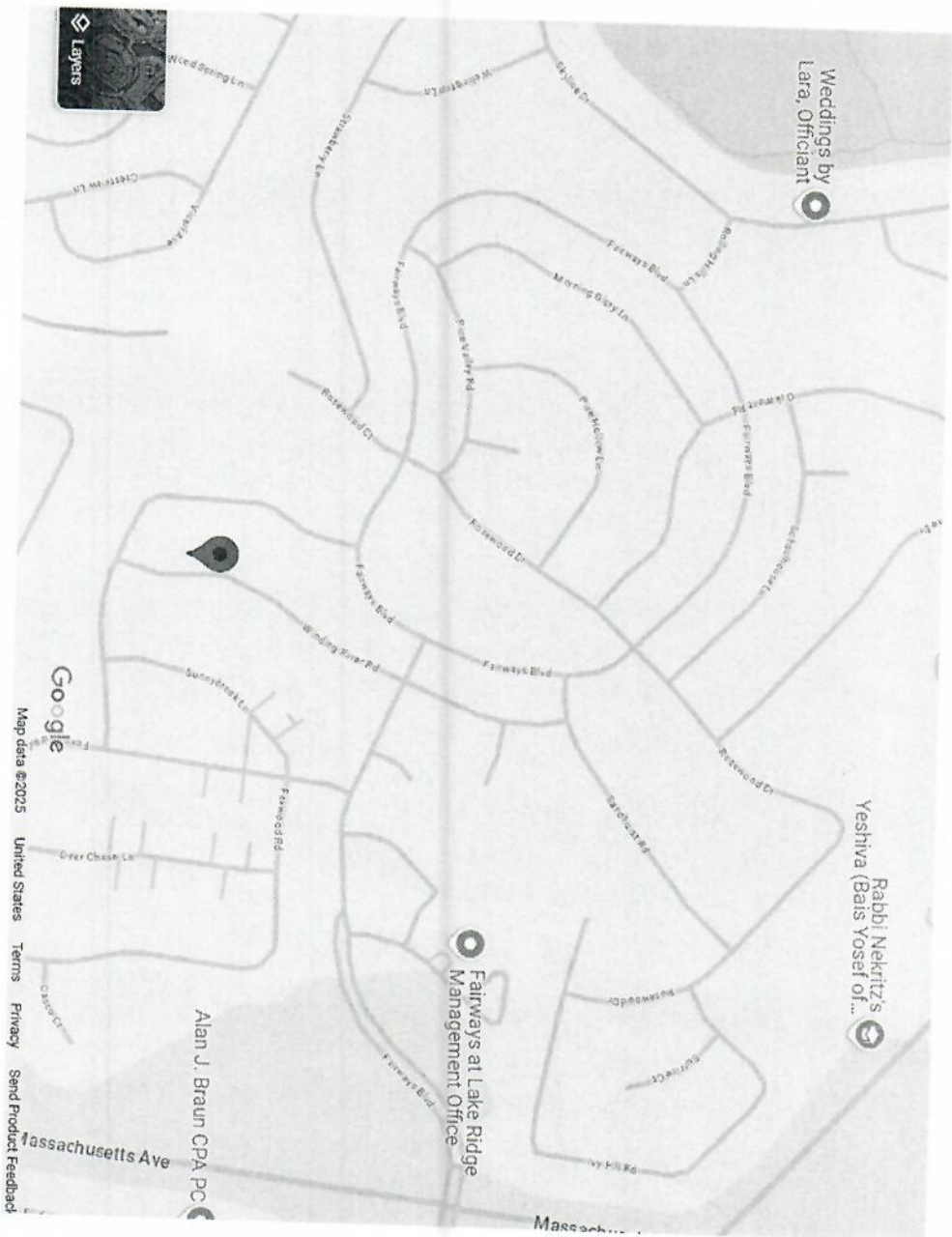
Lives in 55+ community called Fairways at Lake Ridge

Clubhouse includes gym and pool

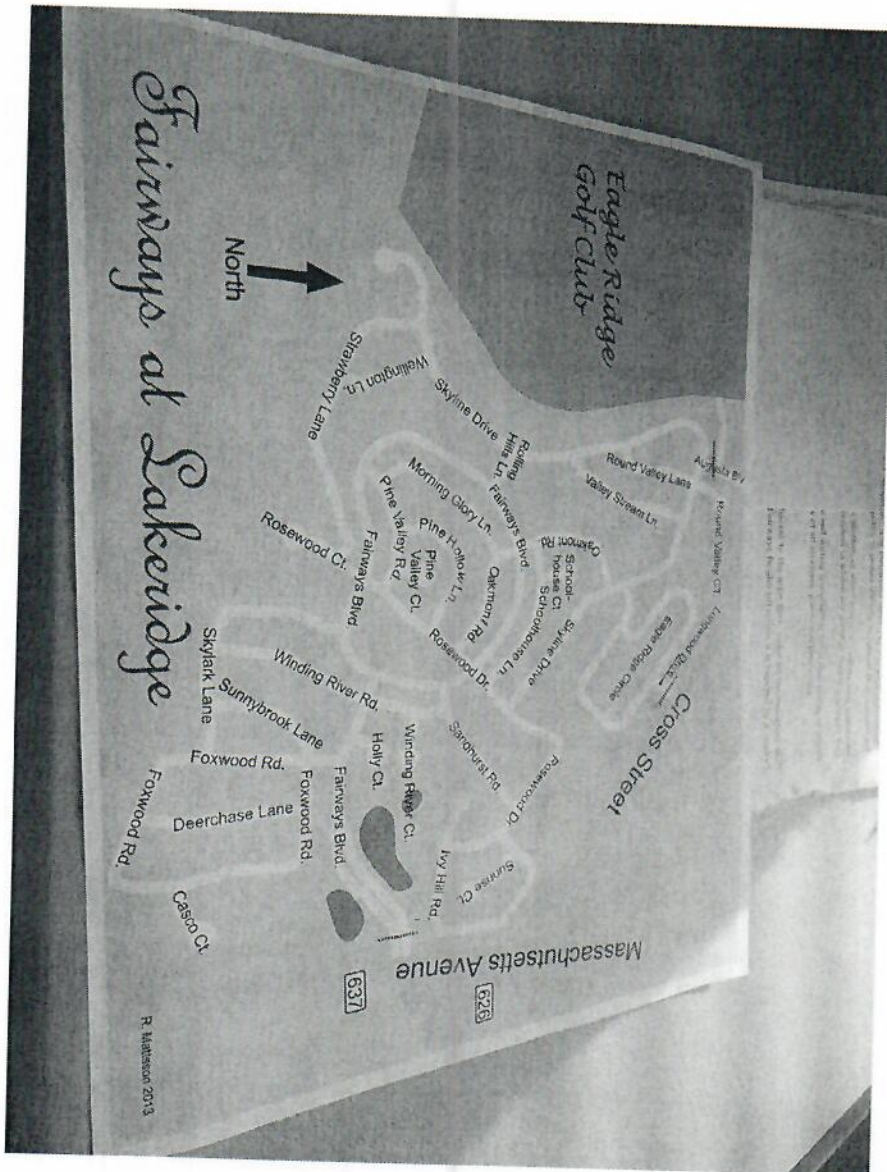
The Fairways at Lake Ridge active adult community is a mix of 90 attached courtyard homes and approximately another thousand single-family homes.

The community is situated on 360 acres of tree-lined streets, winding roads, and walking paths

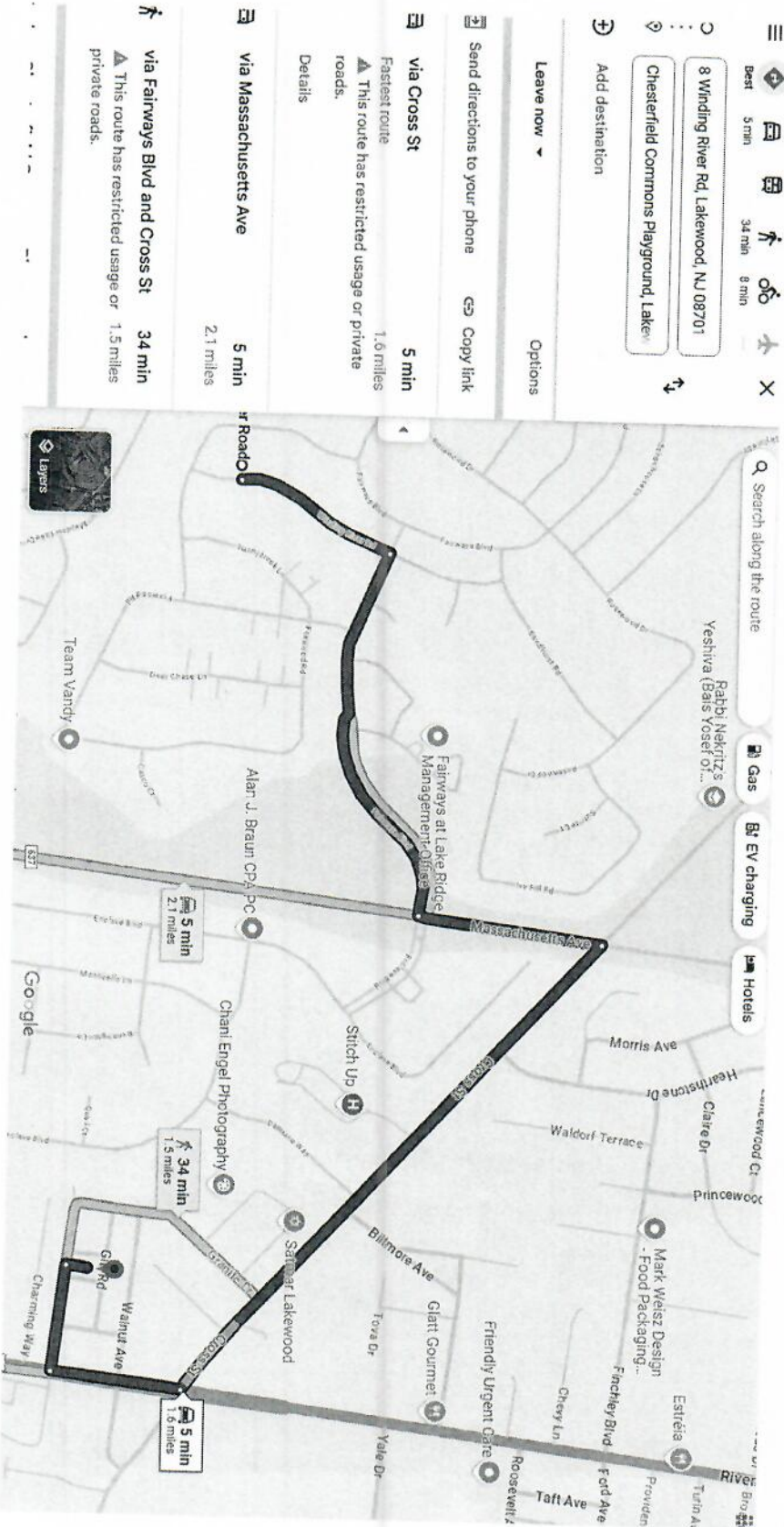
Map of Fairways
Red marker is Arnold
Shenkman's home.



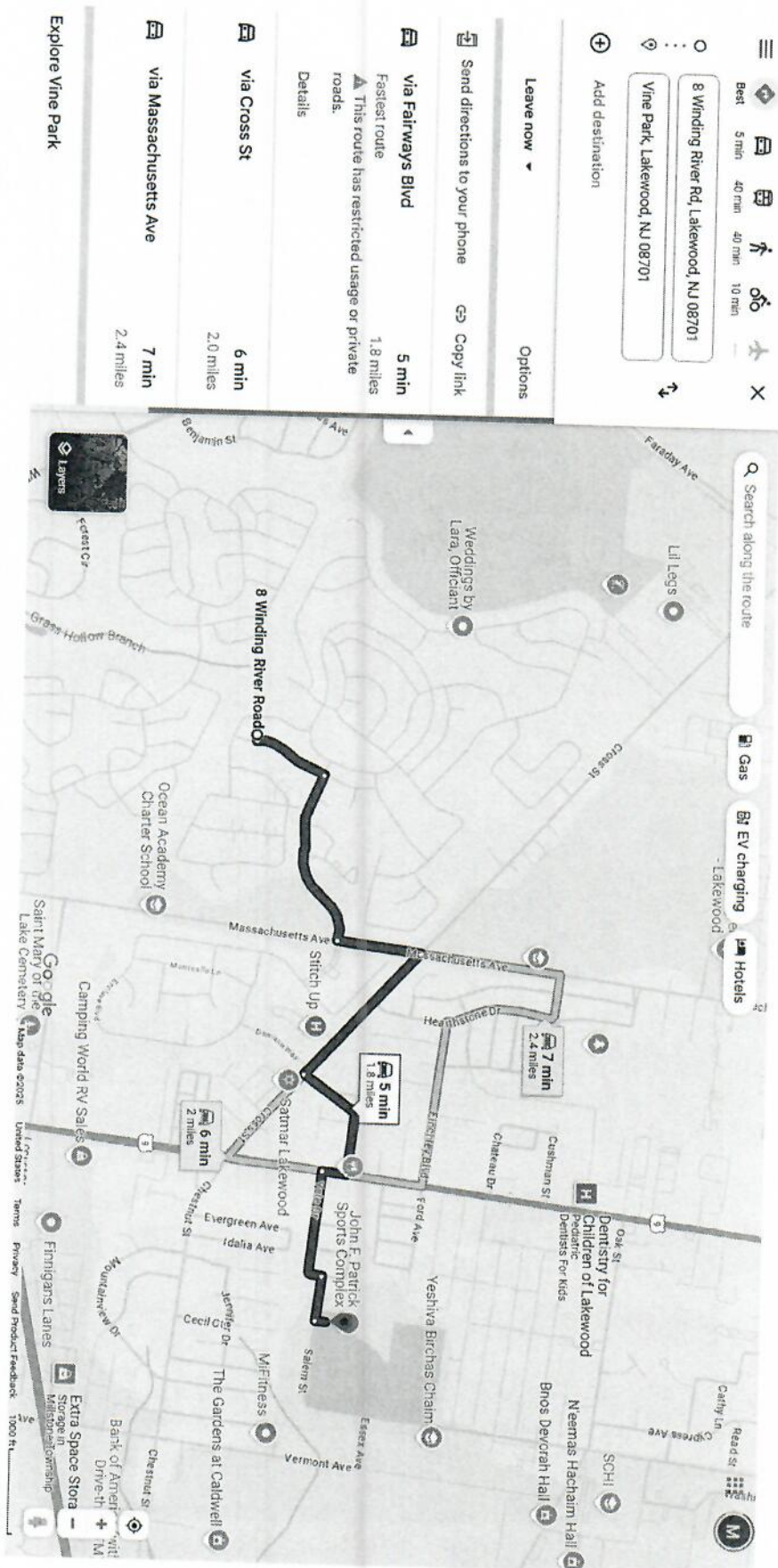
Another map of Fairways at Lakeridge



Children's playground closest to 8 Winding River Rd.



Closest city park to 8 winding river rd.



Communication and Internet

Akiva's father, Arnold, will not have any internet in the house and all devices, besides for his personal cell phone will be removed. Arnold's personal cell phone will be locked.

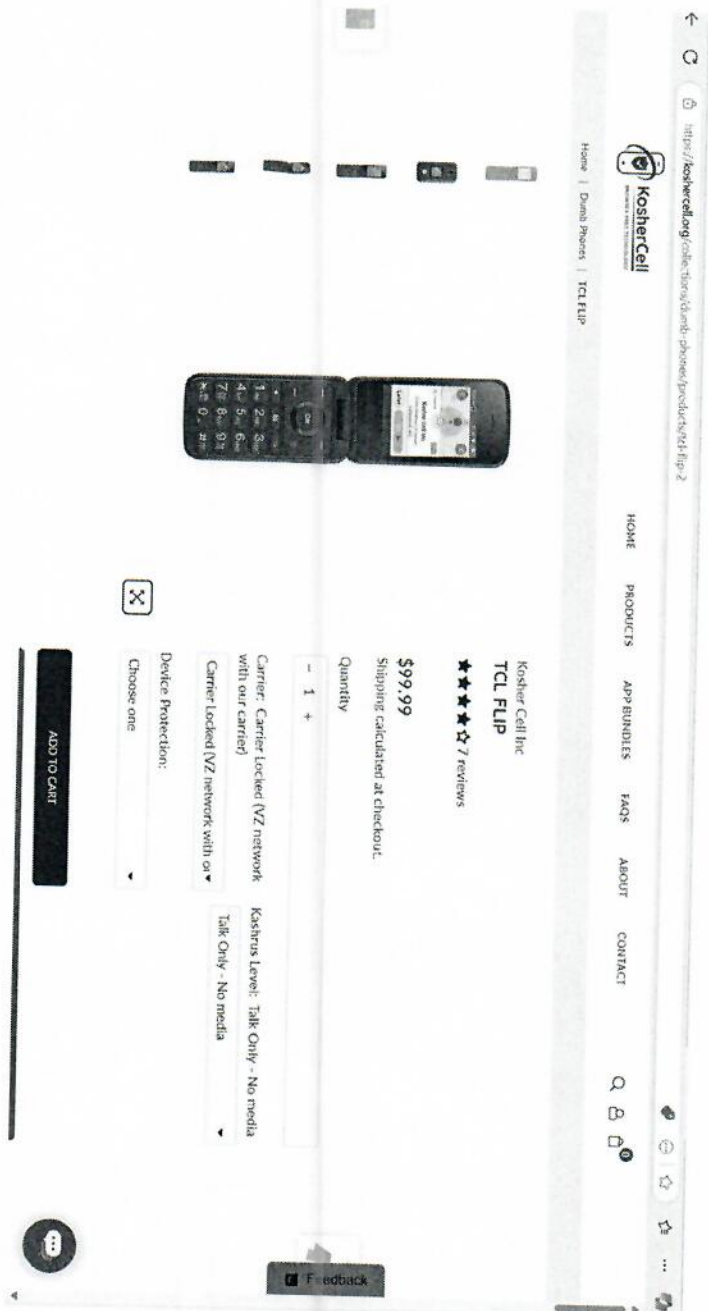
Arnold's cell phone will be brought to a local internet-safety organization called TAG, who will ensure that the device will not be able to access any explicit websites.

LINK: TAG

Akiva will have a cellphone that is a talk-only cell phone without any text messaging or camera ability. See next slide.

Akiva's cellphone

Akiva will receive a
Cellphone similar to this.
One that has only
talk capabilities with no
option for texting or
Internet connection.

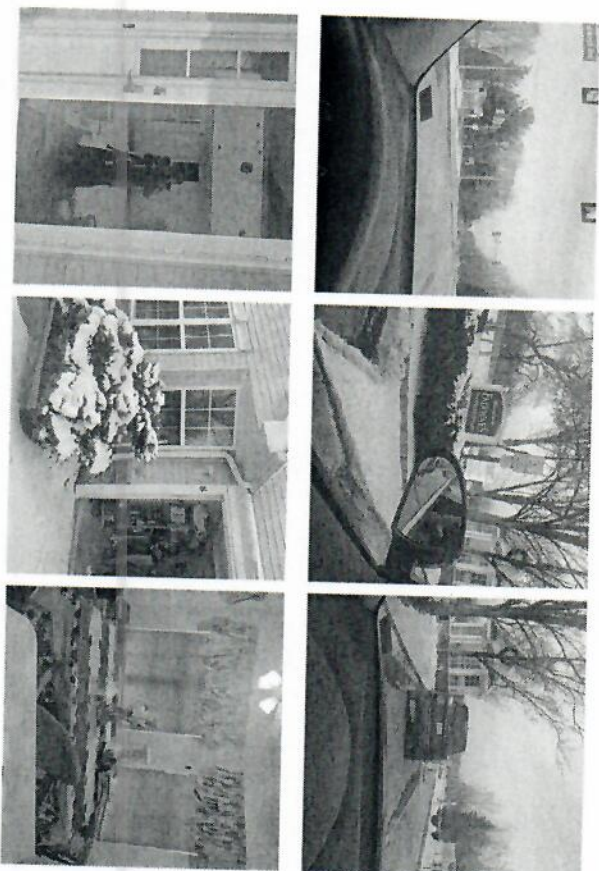


Picture Arnold's community

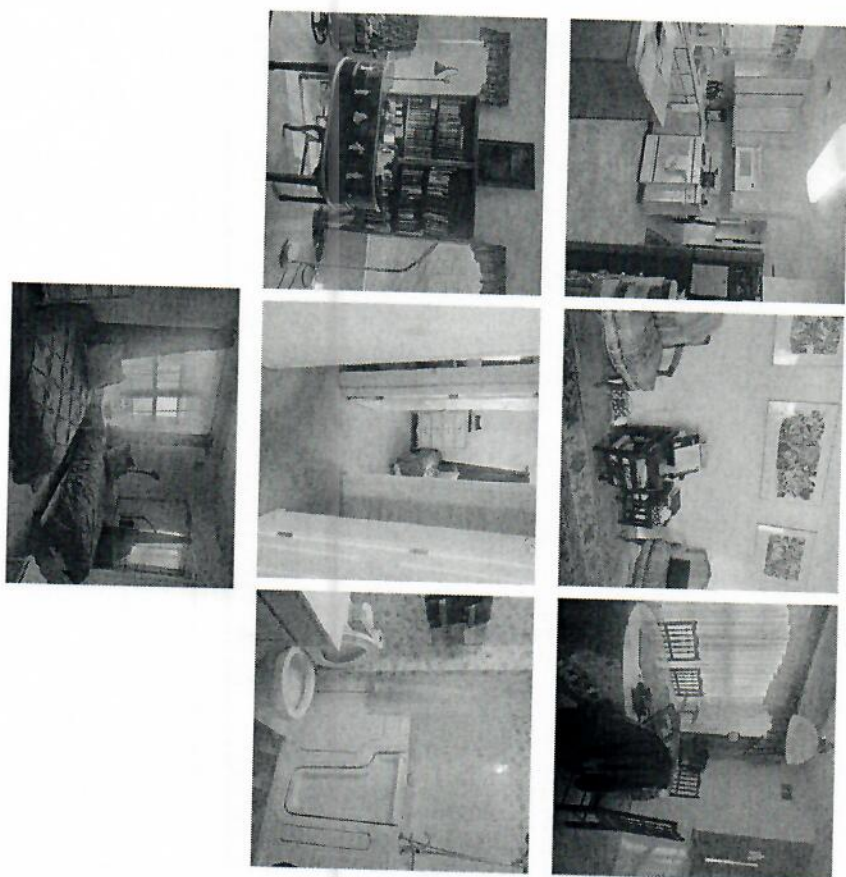
Pictures of gated community,

Pictures of both entrances to Arnold's

Home and kitchen eat-in area.



Arnold's home Cont'd



Daily Schedule: Option #1 Complete Home Confinement:

7:00: Wake Up, Pray
8:00: Learn Daf Yomi with chavruta
8:45-9:30 Cook breakfast, eat breakfast, clean up breakfast
9:30-11:00 DIY Building/Electrical/Craft project
11:00-12:00 Chavruta hebrew learning skills
12:00-1:00 Lunch prep, cook, eat lunch, clean up lunch
1:00-1:30 Personal time
1:30-2:00 Afternoon prayers
2:00-3:30 DIY Building/Electrical/Craft project
3:30-4:30 Personal time: i.e., listen to music or radio on cassette or CD player (no wi-fi capabilities), board games or card games with father and/or mother and/or visitor, plan tomorrow's meals, do laundry, change linens, vacuum carpet, handyman work around house.
THURSDAY AFTERNOON COOK FOR SHABBOS
4:30-6:00 Prep dinner, cook dinner, eat dinner, cleanup
6:30-7:30 Phone time, reading
7:30-8:30 Learning with Chavruta in-home or over phone - Rabbi Chaim Shlomo Rothenberg
8:30-9:00 Nighttime prayer in-home
9:00-9:30 Personal time: i.e., see above
THURSDAY NIGHTS: COOK FOR SHABBOS
9:30-10:00 Shower and Read in bed
10:00 Lights out

Daily Schedule: Option #2 with limited, supervised travel outside of Arnold's home and ankle bracelet (GPS Tracker):

6:00: Wake Up, Pray and learn Daf Yomi in local synagogue in 55+ community Bais Torah Utefilah of Fairways 12 Schoolhouse Ln, Lakewood, NJ (.5 miles up the rode, within the adult community)

7:15-7:40 Breakfast, Lunch prep, and cleanup

7:40-8:00 Driven to work by Dvora Shenkman (mother)

8:00 AM - 5:00 PM Work at HVAC Depot. (Afternoon prayers are said at work. No leaving) - See letter of employment

5:00-5:20 Picked up by Arnold or Dvora and brought back to Arnold's home

5:20-6:30 Dinner Prep, Cook, Eat, and Cleanup

6:30-7:30 Phone time, reading, handy work around the house, some sort of craft, wood, DIY project in the house.

7:30-8:30 Learning with Chavruta in-home or over phone - Chaim Shlomo Rothenberg 718-926-8953

8:30-9:30 Personal time, listen to music or radio on cassette or CD player (no wi-fi) capabilities, board games or card games with father and/or mother and/or visitor.

9:30-10:00 Read in bed

10:00 Lights out

If the judge approves,

Akiva has been offered a position in the HVAC Depot.

Owner name is Yehuda Zirklin
732-426-3428

It is located in a warehouse in an industrial neighborhood in Lakewood, NJ.



HVAC DEPOT INC
785 Vassar Ave
Lakewood , NJ 08701

Phone 732-426-3428
Fax

To Whom it May Concern,
Akiva D. Shenkman has been accepted for employment at our technical support department located at 785 Vassar Avenue Lakewood NJ 08701.
His hours of employment will be between 8 AM and 5PM Monday through Thursday, Friday 8-12.
His hours will be flexible in case of any appointments

Yehuda Zirklin

Map between the home of Arnold Shenkman and HVAC Depot

